

**U.S. Comments on Draft Texts of the Code Section 3.2, Appendix 3.2.1
(Bovine Semen) of the OIE *International Animal Health Code***

(Submitted to the OIE on May 8, 2002)

Article 3.2.1.5 – sections 1d), 2f) and 4f), pertaining to Pre-quarantine testing, Testing in the quarantine station prior to entering the semen collection facility, and Testing Programme for bovines resident in the semen collection facilities:

As in our previous comments submitted to the Commission on January 2002, the United States strongly opposes the proposal that all bulls entering any semen collection facility be IBR-sero-negative. There is no conclusive scientific evidence to support a health measure that sero-negativity is required for bulls to produce semen free of IBR virus. As mentioned earlier, decades of experience show that IBR-seropositive bulls residing in semen collection centers can be successfully used for artificial insemination and that semen distributed from bulls residing in such centers does not transmit disease. It is illogical and irresponsible for Article 2.3.5.7 to be ignored in Appendix 3.2.1.

Furthermore, vaccination for IBR is almost ubiquitous in North America, especially in the beef cattle industry. A requirement that mandates that all bulls entering a collection center be IBR-seronegative unnecessarily disqualifies an entire category of bulls. The management of semen collection facilities as regards IBR ensures that countries who may want semen from sero-negative bulls will get it. A handful of countries should not be permitted to dictate how semen is traded among the Americas, or how the Americas trades with countries in other continents.

In North America, a collection center that wishes to export semen to multiple regions of the world may, within its structure, have established several distinct herds. As previously stated, the United States will accept the European Union requirements that AI center herds be IBR-seronegative in order *to export semen to them*. Where national programs do exist for IBR control, it is reasonable to expect that donors be seronegative. Comments submitted previously maintained this option. However, it is not acceptable for the OIE to recommend requiring that **all** donors or the herds where they stand be seronegative.

Finally, the OIE Manual for Diagnostic Tests and Vaccines (*the Manual*) specifies the semen culture test as a internationally recognized testing procedure for assuring freedom from IBR in semen. Such testing has worked well and provided countries the assurance they want against possible IBR introduction through semen. It is inappropriate and unacceptable for the OIE to dictate a specific component of a disease control program of one group of countries onto the remainder of the world when there is no compelling evidence that one control program is better than another. We have a long history of safely trading semen from IBR seropositive bulls. Such trading has been successfully and safely conducted by abiding to the guidelines of Article 2.3.5.7 found in the IBR Code Chapter.

Section 3.2, Appendix 3.2.1 – Bovine Semen

Therefore, we strongly recommend that any reference to IBR be removed from the Bovine Semen Code Manual. Instead, the current Code Chapter on IBR, particularly Article 2.3.5.7, provides countries with viable and workable options for safely importing bovine semen.

Thank you for the opportunity to review this Chapter and for considering our comments.

Sincerely,

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United States of America